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UNITED STATES DISTRICT COURT EASTERN DISTRICT OF NEW YORK

TOPCARE PRODUCTS, INC.

FEB 1 2 2013 *
BROOKLYN UFFICE

Plaintiff,

Civil Action No.

ECF CASE

BLOCK, J.

V.

ROYAL MANUFACTURING, INC. Defendants.

GOLD, M.J.

COMPLAINT

Plaintiff, Topcare Products, Inc. (hereinafter "Topcare" or "Plaintiff"), complains of the defendant, Royal Manufacturing Inc. (hereinafter "Royal" or "Defendant"), as follows:

JURISDICTION AND VENUE

- 1. This action for copyright infringement arises under the Copyright Act of 1976, Title 17 U.S.C. §101 et. seq.
 - 2. This court has federal question jurisdiction under 28 U.S.C. §§1331 and 1338(a)(b).
 - 3. Venue in this judicial district is proper under 28 U.S.C. §1391(b) and (c), and

§1400(a), in that a substantial part of the acts or omissions giving rise to the claim herein occurred within this judicial district.

- 4. This Court has personal jurisdiction over Royal in this action by virtue of the fact that it is doing or transacting business here and has committed acts in this district that, as described further below, are designed to infringe Topcare's copyrights.
- 5. Defendant directly and via its agents, transacts business within this district and derives substantial revenue from this district.

THE PARTIES

- 6. Topcare Products, Inc. is a New York corporation with its principal place of business located at 10 Jay Street, Suite 402, Brooklyn, New York 11201.
- 7. Upon information and belief, defendant Royal Manufacturing Inc. is a New Jersey Corporation with its principal place of business located at 24 Sheridan Ave., Clifton, NJ 02011.

COUNT I COPYRIGHT INFRINGEMENT

- 8. Topcare is in the business of creating and acquiring original artwork for use in garments, shower curtains, rugs, etc.
- 9. Topcare is the owner of all right, title and interest in and to each of the designs identified below:
 - a) Seashell Design;
 - b) Elephant;
 - c) Black & White:
 - d) Leaf Pattern;
 - e) Burgundy Rose;

- f) Abstract Floral;
- g) Elephant 2006;
- h) Flowers on Blue Wash;
- i) Flowers on Beige Wash;
- j) Butterflies;
- k) Black & Grey;
- 1) Seashell Green; and
- m) Forget Me Not; (collectively hereinafter "Subject Designs").

A true copy of each design is attached hereto as Exhibit A.

- 10. The Subject Designs are original works, and the designs are copyrightable subject matter under the copyright laws of United States, 17 U.S.C. § 101 et seq.
- 11. Topcare has duly obtained copyright Certificates of Registration covering its Subject Designs, as follows:
 - a) "Book 1 of Designs," Copyright Registration No. VA1-420-294;
 - b) "Book #1 (Book of 14 Designs)," Copyright Registration No. VA1-369-888; and
 - c) "Book 1 of Botanic Designs," Copyright Registration No. VA1-420-292 (collectively hereinafter "Copyrights").

A true copy of the Copyright Registration, Nos. VA1-420-294, VA1-369-888, and VA1-420-292 are attached hereto as Exhibit B.

12. Pursuant to §106 of the Copyright Act, Topcare has the exclusive right to reproduce and distribute, and to authorize others to reproduce and distribute copies of the Subject Designs.

- 13. Upon information and belief, Royal had access to Plaintiff's Subject Designs and with full knowledge of Topcare's rights to these designs, knowingly disregarded those rights by making and distributing or authorizing others to make and distribute infringing reproductions of the Subject Designs.
- 14. On information and belief, since on or about November 2008, Royal has offered for sale and sold products bearing the Subject Designs to at least one vendor (hereinafter "Defendant's Products.") Photos of Royal's infringing designs are attached hereto as Exhibit C.
- 15. Royal infringed, and is infringing Topcare's Subject Designs and Copyrights by importing, producing, manufacturing, vending, distributing, selling, displaying and/or promoting shower curtains, rugs, and other products that bear a design substantially similar to the Subject Designs, and by causing and/or participating in said importing, producing, manufacturing, vending, distributing, selling, displaying and/or promoting of said infringing copies.
- 16. On or about December 11, 2008, a cease and desist letter was sent to Royal giving Defendant notice of the Subject Designs and Copyrights and requesting that Royal discontinue all sales of Defendant's Products and account to Topcare for past infringement.
- 17. On or about January 7, 2009, a second cease and desist letter was sent to Royal, again giving Defendant notice of the alleged infringement and requesting that Royal discontinue all sales of Defendant's Products and account to Topcare for past infringement.
- 18. On information and belief, subsequent to January 7, 2009, Royal continues to sell and offers for sale products with infringing reproductions of the Subject Designs.
- 19. All of the aforementioned activities of Defendant are in violation of the rights of Topcare under 17 U.S.C. §101 *et seg.*

- 20. All of Defendant's aforementioned acts were without permission, license or consent of Topcare.
- 21. Topcare has been damaged by Defendant's actions in an amount as yet unknown and Defendant is further continuously damaging Topcare in a manner wherein Topcare has no adequate remedy at law and Defendant's acts, if continued, will damage Topcare in an amount as yet unknown. As a direct and proximate result of the foregoing acts of infringement by the Defendant, Topcare has been harmed and is entitled to recover, in addition to its attorney's fees and cost of suit, its damages and Defendant's profits attributable to the infringement pursuant to \$504 of the Copyright Act, in an amount to be established at trial or, alternatively, statutory damages in the maximum amount for deliberate and willful infringement at the election of Topcare. In addition, Topcare has been and, unless Defendant is enjoined, will be irreparably harmed.

WHEREFORE, Topcare prays for judgment against Defendant as follows:

A. That the Defendant, its directors, officers, agents, servants, employees, related companies, parent companies, subsidiaries, licensees, assigns, and all parties in privity with them, be enjoined, temporarily and preliminarily during the pendency of this action and permanently from infringing the Subject Designs and Copyrights of Topcare in any manner including, but not limited to, importing, producing, manufacturing, printing, reprinting, publishing, vending, distributing, selling, displaying, promoting or advertising any copies of the Subject Designs that are the subject of Topcare's Copyright Registration Nos. VA1-420-294, VA1-369-888, and VA1-420-292, or by causing and/or participating in such importing, producing, manufacturing, printing, reprinting, publishing, vending, distributing, displaying,

selling, promoting or advertising.

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- B. That Defendant be required to deliver to the U.S. Marshal during the pendency of this action all infringing copies of Topcare's copyrighted items in possession or under the control of the Defendant.
- C. That Defendant be required to pay to Topcare such damages as Topcare has sustained in consequence of Defendant's infringement of Topcare's Subject Designs and Copyrights.
- D. For Defendant to file with this Court and serve upon Topcare, a report in writing and under oath setting forth in detail the manner and form in which Defendant has complied with the injunction.
- E. For an accounting by the Defendant to Topcare of all of Defendant's profits, gains and sums arising from the alleged acts of copyright infringement.
- F. For an award of statutory damages for willful infringement in the amount of \$150,000 per infringement, as prescribed in \$504 of the Copyright Act.
- G. For allowable prejudgment interest, costs of the suit, disbursements and reasonable attorneys' fees incurred in connection with this action as permitted by the Copyright Act.
- H. For any and all such other further relief as this Court may deem just and equitable.

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DEMAND FOR JURY TRIAL

Trial by jury is hereby demanded as to all issues in this action so triable.

Dated: February 10, 2009

New York, New York

Howard C. Miskin (HM7038) Gloria Tsui-Yip (GT9377)

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Wendi Opper Uzar (WO4547)

Attorneys for Plaintiff

TOPCARE PRODUCTS, INC.

Miskin & Tsui-Yip LLP 1350 Broadway, Suite 802

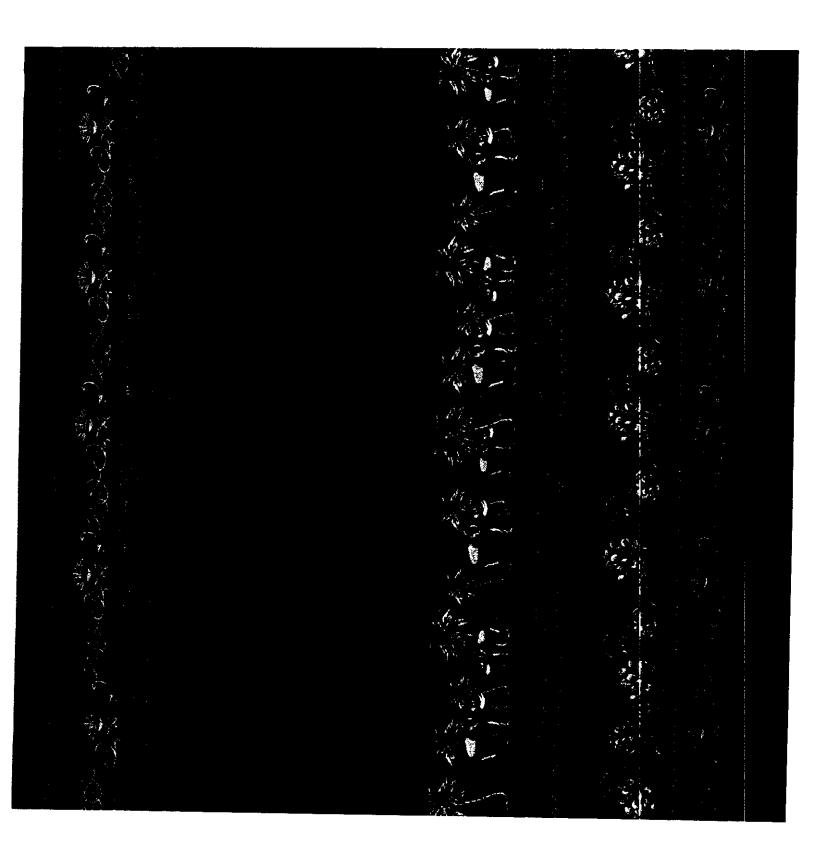
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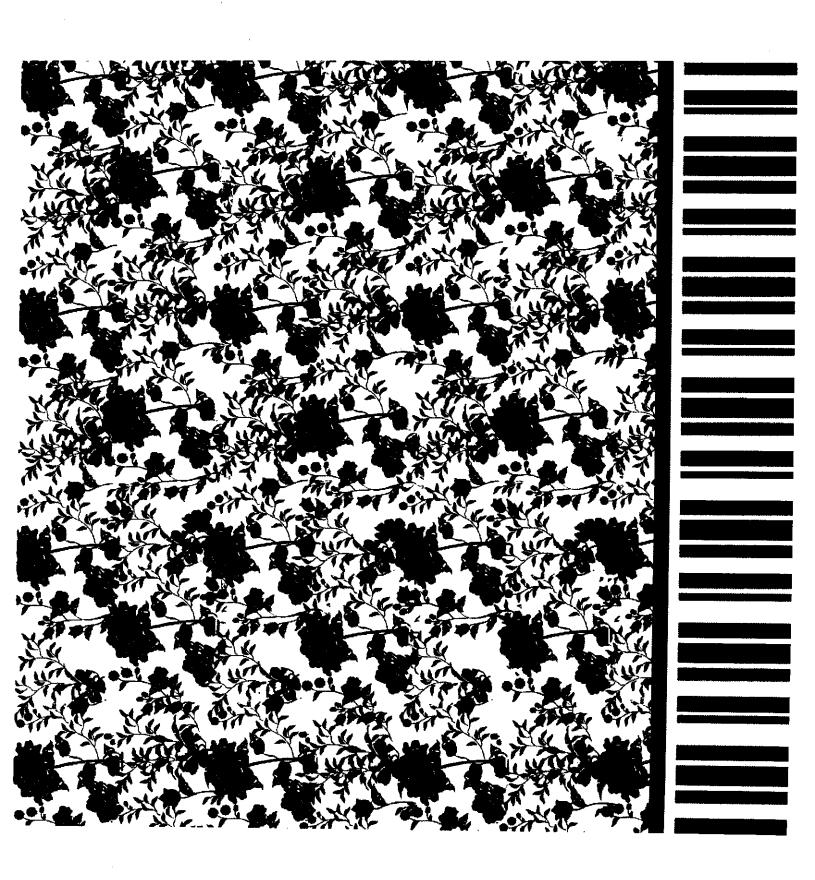
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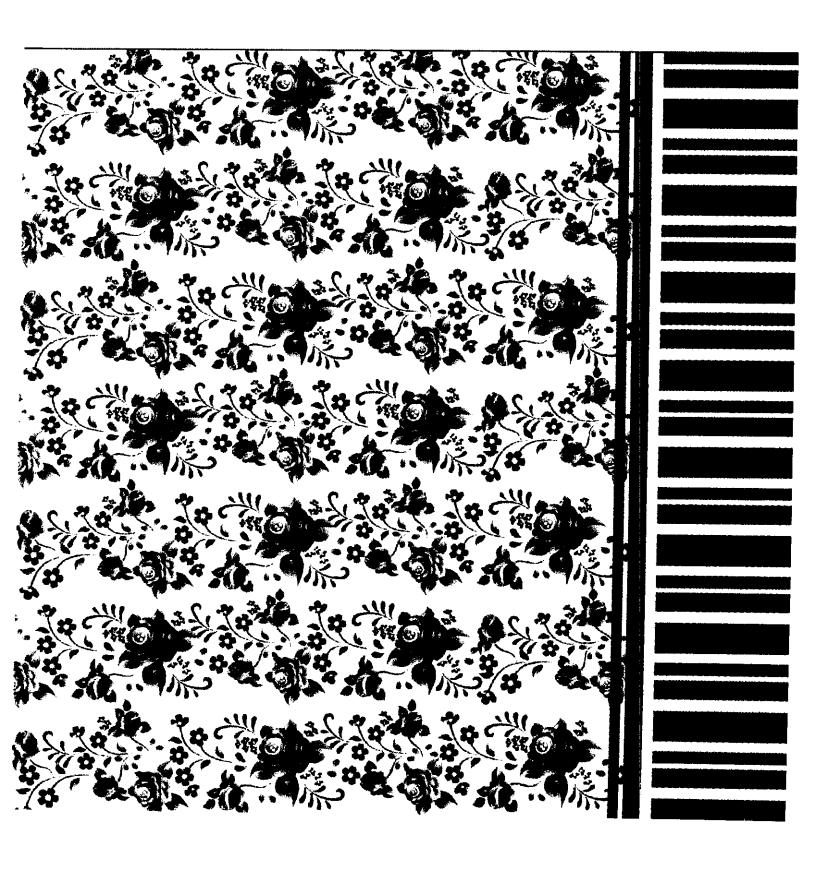


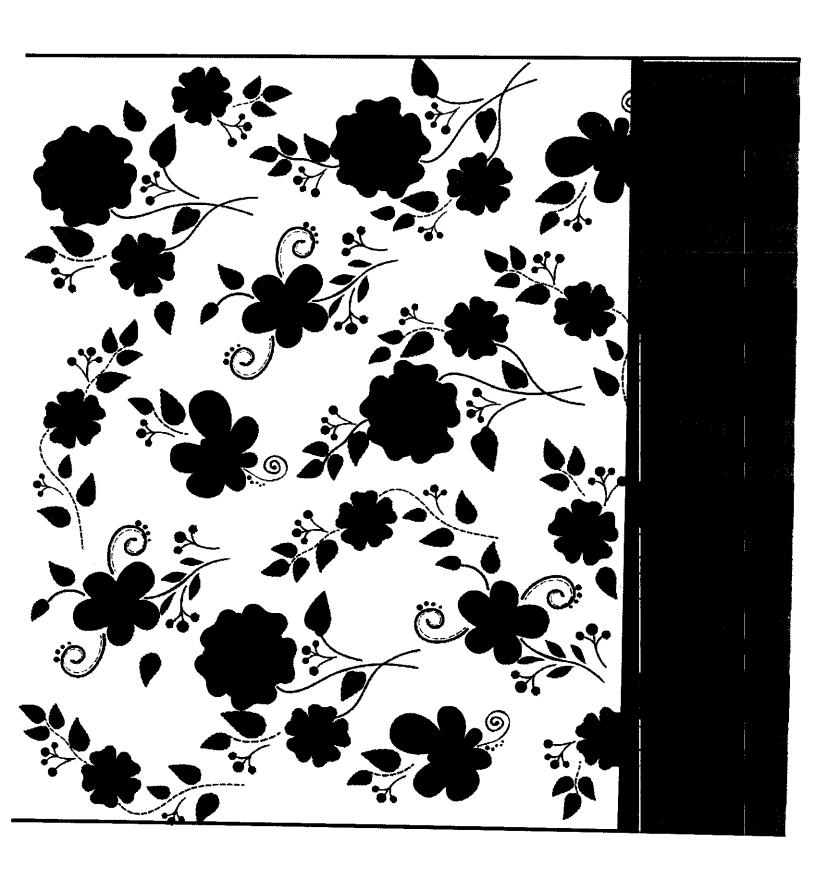


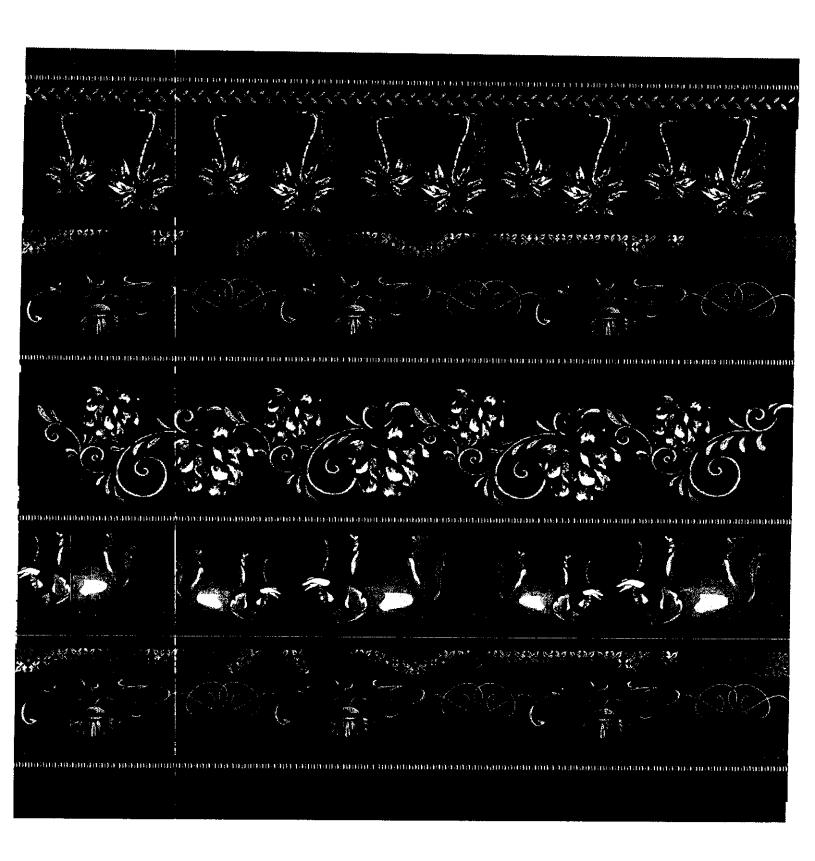


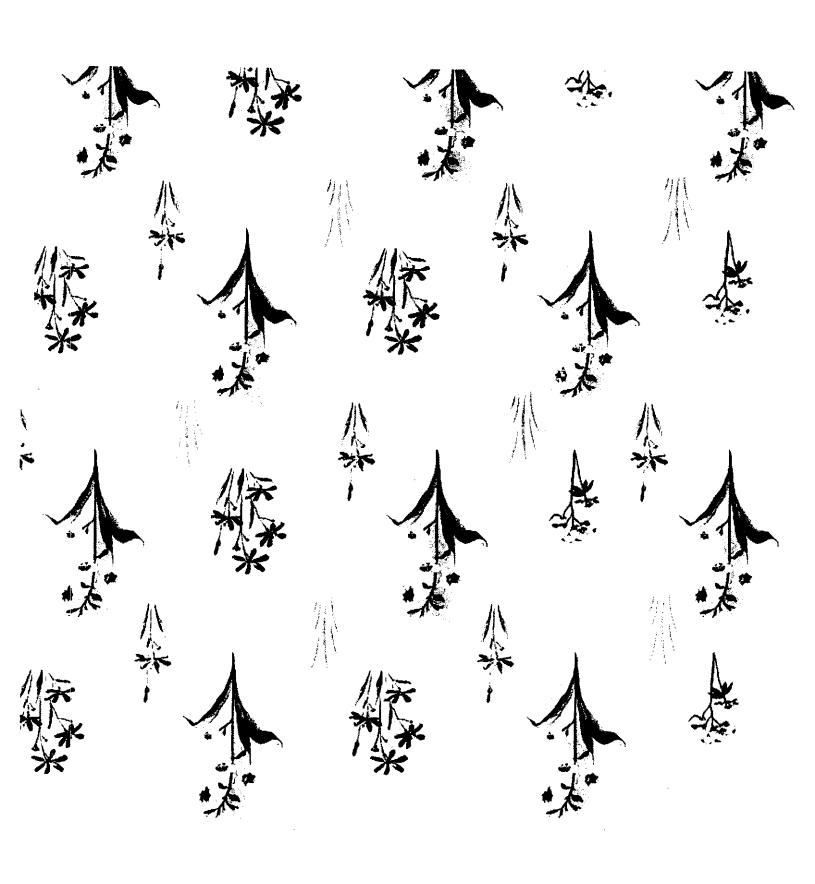


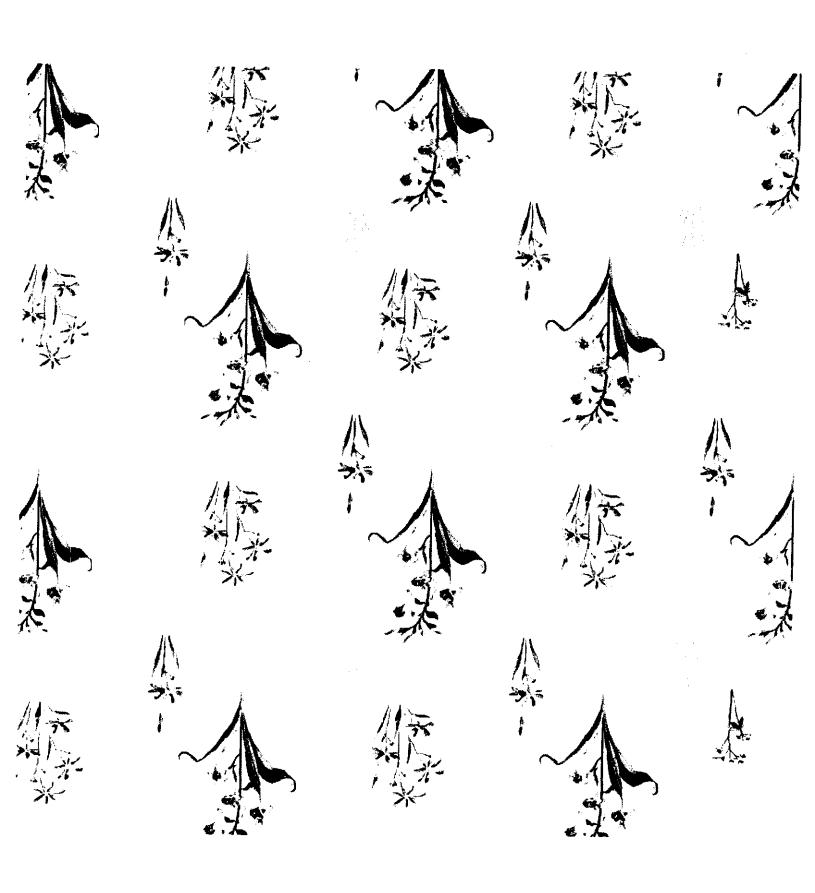




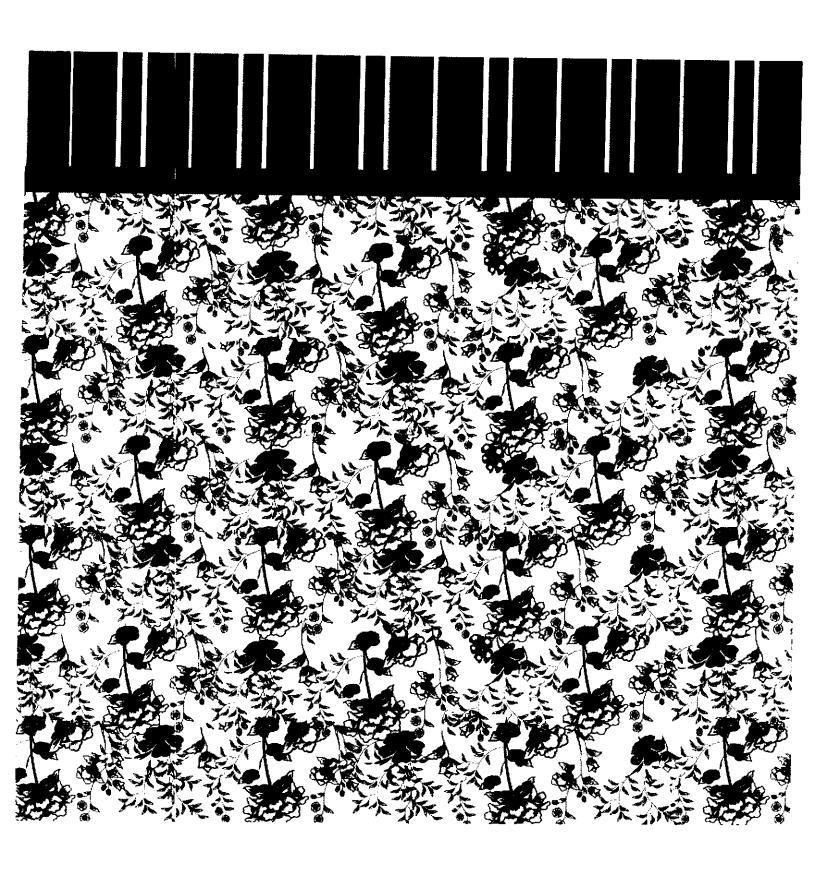


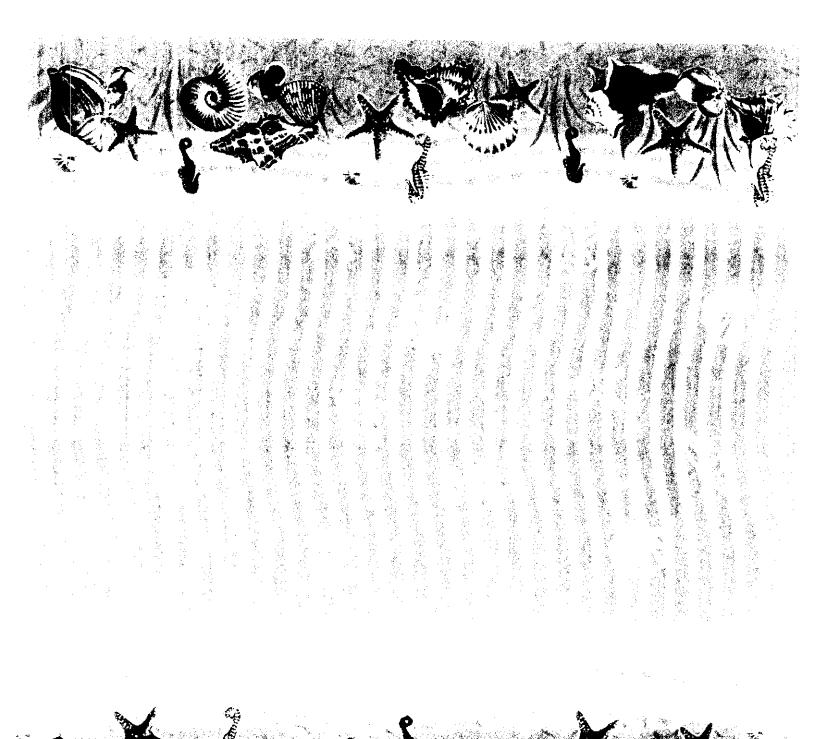


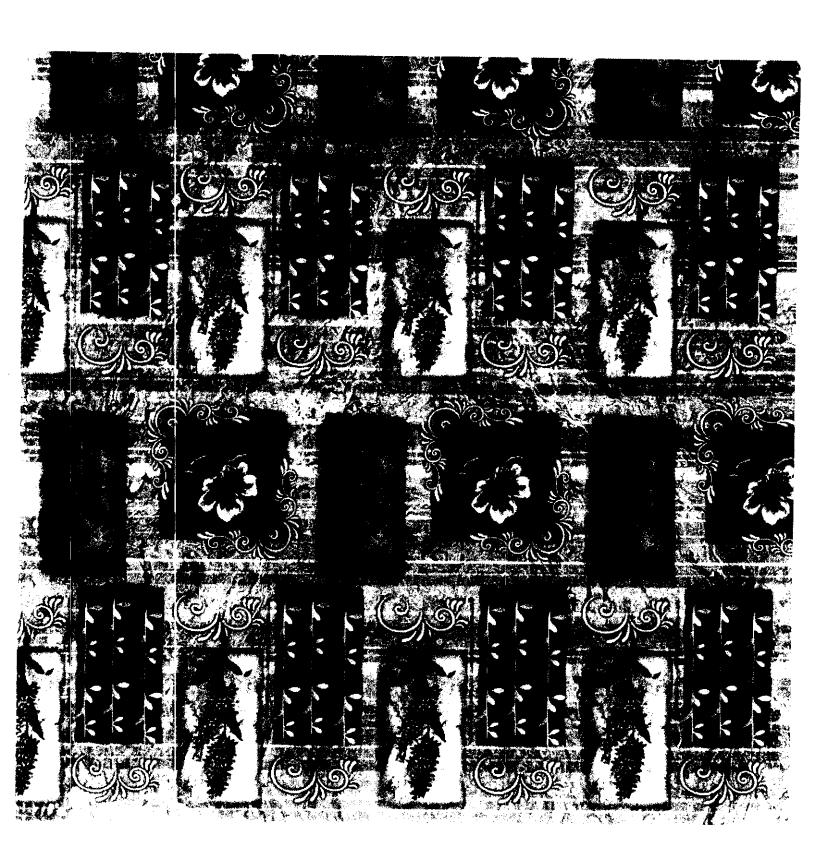












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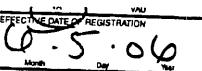
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Marybeth Peters

Register of Copyrights, United States of America

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¹⁷ USC \$506(e) Any bettern who showingly makes a face representation of a material fact in the application, shall be fined not more than \$2,500.

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